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✓ TRACKED
☐ Response to claim

NUFARM AMERICAS INC.

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Phone: 630-455-2000 ■ Fax: 630-455-2001

FEBRUARY 1, 2011

Document Processing Desk (DCI/PRD)
Russell Wasern
Office of Pesticide Programs (7508P)
US Environmental Protection Agency
2775 South Crystal Drive
Arlington, VA 22202-4501

NOVEMBER 10, 2010
GENERIC DATA CALL-IN NOTICE ID# RR-129099-30160
IMIDACLOPRID

Dear Mr. Wasern

Please find enclosed 90-day response to subject DCI for Nufarm Inc (71368) & Nufarm Americas Inc. (228)

Thank you and kind regards,

Nathan P. Ehresman

Director, Regulatory Affairs
Nufarm Americas, Inc.

S.F.
FEB 11 2011

United States Environmental Protection
Agency Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address NUFARM, INC. 150 HARVESTER DRIVE SUITE 200 BURR RIDGE, IL 60527		2. Case # and Name Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160	
4. EPA Product Registration	5. I wish to cancel this product regis- tration volun- tarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis- tration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
71368-61			✓	N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date	
Signature and Title of Company's Authorized Representative <i>[Signature]</i> <i>Director, Regulatory Affairs</i>					
10. Name of Company <i>Nufarm, Inc.</i>				11. Phone Number <i>919-655-0018</i>	

United States Environmental Protection
Agency Washington, D.C. 20460

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.4300	<u>Environmental Fate Data Requirements (Conventional Chemical)</u> Aerobic aquatic metabolism					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI or PAIRA	24	3
850.4100	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u> Terrestrial plant toxicity, Tier 1 (seeding emergence) (5, 10)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4150	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (3, 11, 12)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4400	Aquatic plant toxicity test using Lemna spp. Tiers I and II (4)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP or TGAI	12	3
875.2300	<u>Post-Application Exposure Data Requirements (Conventional Chemical)</u> Indoor surface residue dissipation (1, 13, 14)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.3040	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u> Field testing for pollinators (2, 15)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	24	3
870.7800	<u>Toxicology Data Requirements (Conventional Chemical)</u> Immunotoxicity					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI	12	
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law Signature and Title of Company's Authorized Representative <i>[Signature]</i> , Director Regulatory Affairs							11. Date January 05, 2011		
12. Name of Company Nufarm, Inc.							13. Phone Number 919-655-0018		

United States Environmental Protection
Agency Washington, D.C. 20460

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Special Study	Residue Analysis of Nectar and Pollen in Flowering Crops (7,8,9,17)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	48	3
Special Study	Seed Leaching Study Using TEP (6,16)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
<p>Initial to indicate certification as to information on this page (full text of certification is on page one).</p> <p style="text-align: right;">Date January 05, 2011</p>									

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228-512		71368-61		N.A.	N.A.
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10. Name of Company Nufarm Americas Inc.				11. Phone Number 919-655-0018	

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Agency Washington, D.C. 20460

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<p>Initial to indicate certification as to information on this page (full text of certification is on page one).</p>									
								Date	



United States Environmental Protection Agency
Washington, D.C. 20460
CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Nufarm Inc

Company Number

71368

Chemical Name

Imidacloprid

EPA Chemical Number

129099

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

See Attached List

Date of Offer

2/1/11

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date

2/1/11

Name and Title (Please Print or Type)

Nathan P. Ehresman / Director, Regulatory Affairs

United States Environmental Protection
Agency Washington, D.C. 20460

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name:

Co. Nr.	Company Name	Agent For	Address	City & State	Zip
432	BAYER ENVIRONMENTAL SCIENCE		PO Box 12014 2 T. W. ALEXANDER DRIVE	RESEARCH TRIANGLE PARK	NC 27709
39967	LANXESS CORPORATION		111 RIDC PARK WEST DRIVE	PITTSBURGH	PA 152751112
83558	CELSIUS PROPERTY B.V., AMSTERDAM (NL)	MANA, INC	4515 FALLS OF NEUSE RD., SUITE 300	RALEIGH	NC 27609
70506	UNITED PHOSPHORUS, INC		630 FREEDOM BUSINESS CENTER, SUITE 402	KING OF PRUSSIA	PA 19406
71368	NUFARM, INC.		150 HARVESTER DRIVE SUITE 200	BURR RIDGE	IL 60527
228	NUFARM AMERICAS INC.		150 HARVESTER DRIVE, SUITE 200	BURR RIDGE	IL 60527
264	BAYER CROPSOURCE LP		PO Box 12014 2 T.W. ALEXANDER DRIVE	RESEARCH TRIANGLE PARK	NC 27709
84456	HEBEI VEYONG BIO-CHEMICAL CO., LTD.	WAGNER REGULATORY ASSOCIATES, INC.	PO Box 640 7460 LANCASTER PIKE, SUITE 9	HOCKESSIN	DE 197070640
83070	ADVAN LLC		2520 MERIDIAN PKWY., SUITE 525	DURHAM	NC 27713
83851	AMTIDE, LLC		21 HUBBLE	IRVINE	CA 92618
42750	ALBAUGH INC		1525 NE 36TH STREET	ANKENY	IA 50021
53883	CONTROL SOLUTIONS, INC.	D. O'SHAUGHNESSY CONSULTING, INC.	427 HIDE AWAY CIRCLE	CUB RUN	KY 42729
81598	ROTAM LIMITED	IPM RESOURCES LLC	4032 CROCKERS LAKE BLVD., STE 818	SARASOTA	FL 43238
82542	SOURCE DYNAMICS, LLC		10039 E. TROON NORTH DRIVE	SCOTTSDALE	AZ 85262
82633	SHARDA WORLDWIDE EXPORTS PVT. LTD.	WAGNER REGULATORY ASSOCIATES, INC.	7460 LANCASTER PIKE, SUITE 9	HOCKESSIN	DE 197070640
82957	ENSYSTEX III, INC.	PYXIS REGULATORY CONSULTING, INC.	4110 136TH ST., NW	GIG HARBOR	WA 98332